

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1236, 1346, & 1350

**CERTIFICATION OF COUNSEL REGARDING THE FOURTH NOTICE OF (A) BID
DEADLINE, (B) SALE HEARING, AND (C) POTENTIAL ASSUMPTION AND
ASSIGNMENT OF CERTAIN UNEXPIRED LEASES**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On November 25, 2024, the Debtors filed the *Fourth Notice of (A) Bid Deadline, (B) Sale Hearing, and (C) Potential Assumption and Assignment of Certain Unexpired Leases* [D.I. 1236] (“**Fourth Lease Sale Notice**”).

2. On December 13, 2025, 5620 Nolensville Pike, LLC (“**Nolensville**”) filed the *Objection of 5620 Nolensville Pike, LLC to Proposed Assignment of Lease to Burlington Coat Factory Warehouse Corporation* [D.I. 1346] (the “**Nolensville Objection**”).

3. On December 13, 2025, Ross Stores, Inc. (“**Ross**”) also filed *Ross Stores, Inc.’s Objection to the Debtors’ Fourth Notice of Successful Bidders with Respect to the Auction*

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

of Certain of the Debtors' Lease Assets and Assumption and Assignment of Certain Unexpired Leases [D.I. 1350] (the “**Ross Objection**”).

4. Both the Nolensville Objection and the Ross Objection (together the “**Objections**”) relate to Store #5216 located within the South Plaza Shopping Center at 5702 Nolensville Road, Nashville, Tennessee 37211 (the “**Nolensville Lease**”).

5. On December 20, 2024, the Court entered the *Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Terminate or Assume, Assign and Sell Certain Non-Residential Real Property Leases* [D.I. 1410] (the “**December Lease Sale Order**”), which approved the disposition of the leases included in the Fourth Lease Sale Notice, excluding the Nolensville Lease.

6. On January 21, 2025, the Court held a hearing to consider the Objections and the disposition of the Nolensville Lease. The Court overruled the Objections at the hearing and instructed the parties to submit a proposed order under certification of counsel.

7. A copy of the proposed form of order (the “**Proposed Order**”) is attached hereto as **Exhibit 1**. Counsel for the purchaser has reviewed the Proposed Order and consents to entry of the Proposed Order.

8. For the convenience of the Court and all parties in interest, a redline of the Proposed Order against the December Lease Sale Order is attached hereto as **Exhibit 2**.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

[Signature page follows]

Dated: February 4, 2025
Wilmington, Delaware

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